

KAREN L. LOEFFLER
United States Attorney

STEPHEN COOPER
Assistant United States Attorney
Federal Building & U.S. Courthouse
101 Twelfth Avenue, Room 310
Fairbanks, Alaska 99701
(907) 456-0245
(907) 456-0577 (fax)
Email: stephen.cooper@usdoj.gov
Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,) Case No.
)
Plaintiff,) COUNT 1:
) CONSPIRACY TO LAUNDER
vs.) PROCEEDS OF UNLAWFUL
) DISTRIBUTION OF CONTROLLED
LAWRENCE YOICHI SEAMAN) SUBSTANCES
and ELISE DELAINE SEAMAN,) Vio. of 18 U.S.C. § 1956(h)
a.k.a., ELISE DICKSON,)
)
Defendants.) COUNT 2:
) MONEY LAUNDERING
) Vio. of 18 U.S.C. § 1956(a)(1)(A)(i)
) & § 1956(a)(1)(B)(i)
)
) COUNT 3:
) DRUG CONSPIRACY
) Vio. 21 U.S.C. § 846 & § 841(a)(1)
) & § 841(b)(1)(A)
)
) COUNT 4:
) POSSESSING CONTROLLED
) SUBSTANCE WITH INTENT TO
) DISTRIBUTE
) Vio. 21 U.S.C. § 841(a)(1) &
) § 841(b)(1)(B)

I N D I C T M E N T

The United States Attorney charges that:

COUNT 1

CONSPIRACY TO LAUNDER PROCEEDS OF UNLAWFUL DISTRIBUTION OF CONTROLLED SUBSTANCES

Beginning at some exact time unknown, but at least in or about January, 2012, and continuing through the time of the finding of this Indictment, both dates being approximate and inclusive, within the District of Alaska, and elsewhere, LAWRENCE YOICHI SEAMAN and ELISE DELAINE SEAMAN, a.k.a. ELISE DICKSON, did knowingly and intentionally combine, conspire, confederate and agree together and with others known and unknown, to commit an offense against the United States in violation of Title 18, United States Code, Section 1956, to wit: to knowingly conduct financial transactions affecting interstate and foreign commerce, which transactions involved the proceeds of a specified unlawful activity, that is, the unlawful distribution of a Schedule I controlled substance, heroin, in violation of 21 U.S.C. § 841(a)(1),

- 1) with the intent to promote the carrying on of the unlawful distribution of controlled substances, and to conduct such financial transactions knowing that the property involved in the financial transactions

represented the proceeds of some form of unlawful activity, in violation of Title 18 U.S.C. § 1956(a)(1)(A)(i), and

2) knowing the transaction was designed in whole or in part to conceal and disguise the nature, source, ownership, and control of the proceeds of specified unlawful activity, in violation of Title 18 U.S.C. § 1956(a)(1)(B)(i).

All of which is in violation of Title 18, United States Code, § 1956(h).

COUNT 2

MONEY LAUNDERING

On or about July 12, 2013, in the District of Alaska, and elsewhere, LAWRENCE YOICHI SEAMAN and ELISE DELAINE SEAMAN, a.k.a. ELISE DICKSON, did knowingly conduct a financial transaction affecting interstate commerce, to wit, a transfer of funds by means of a deposit in Alaska of United States currency in the amount of \$1,370.00 for subsequent availability in the State of Washington, which transaction involved the proceeds of a specified unlawful activity (namely, the unlawful distribution of a Schedule I controlled substance, heroin, in violation of 21 U.S.C. § 841(a)(1)), with the intent to promote the carrying on of the unlawful distribution of controlled substances, and did conduct such financial transaction while knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, and knowing the transaction

was designed in whole or in part to conceal and disguise the nature, source, ownership, and control of the proceeds of specified unlawful activity.

All of which is in violation of Title 18 U.S.C. § 1956(a)(1)(A)(i) and § 1956(a)(1)(B)(i).

COUNT 3

DRUG CONSPIRACY

Beginning at some exact time unknown, but at least in or about January, 2012, and continuing through the time of the finding of this Indictment, both dates being approximate and inclusive, within the District of Alaska and elsewhere, LAWRENCE YOICHI SEAMAN and ELISE DELAINE SEAMAN, a.k.a. ELISE DICKSON, did knowingly and intentionally combine, conspire, confederate and agree together and with others known and unknown, to distribute and to possess with intent to distribute a controlled substance, to wit, one kilogram or more of a substance containing heroin, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

All of which is in violation of Title 21, United States Code, Sections 846, and 841(a)(1) and (b)(1)(A).

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COUNT 4

DRUG POSSESSION FOR DISTRIBUTION

On or about March 11, 2014, in the District of Alaska and elsewhere, LAWRENCE YOICHI SEAMAN & ELISE DELAINE SEAMAN, a.k.a. ELISE DICKSON, did knowingly and intentionally possess with intent to distribute a controlled substance, to wit, one hundred grams or more of a substance containing heroin.

All of which is in violation of Title 21, United States Code, § 841(a)(1) and § 841(b)(1)(B).

A TRUE BILL.

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

s/ Stephen Cooper
STEPHEN COOPER
Assistant United States Attorney

s/ Karen L. Loeffler
KAREN L. LOEFFLER
United States Attorney
United States of America

DATE: 6/17/14